PREPARED DIRECT TESTIMONY OF MAURICE R. KOESTERER

COMMERCE COMMISSION

Jun 5 4 29 PM 'O

ICC DOCKET NO. 01-0422

CHIEF CLERK'S OFFICE

- 1. Q. Please state your name, occupation and business address.
 - A. My name is Maurice R. Koesterer. My business address is 213 S. Main Street, Waterloo, Illinois, and I am Vice President of Engineering for Harrisonville Telephone Company.
- 2. Q. Please tell us about your experience in the telephone industry.
 - A. I began working for Harrisonville Telephone Company in 1961 in the outside plant department. Between 1961 and 1969, I worked in various capacities from construction to Central Office switching. In 1969, I was named Installation Supervisor serving in tat capacity until being transferred to the engineering department where I served as an Assistant Plant Engineer. In 1979, I was named Chief Engineer, in 1990, Vice President of Engineering and was elected a Director in 1992.
- 3. Q. What are responsibilities as Vice President of Engineering?
 - A. My responsibilities are preparing the outside plant budget and reviewing and approving outside plant projects recommended by the Chief Engineer. Projects are also assigned to me by the President and CEO.
- 4. Q. Is Harrisonville Telephone Company a telecommunications carrier subject to the jurisdiction of the Illinois Commerce Commission, and is it an Illinois Corporation in good standing with the Illinois Secretary of State?
 - A. Yes, it is.
- 5. Q. Would you please describe the Company's operating territory?
 - A. The operating territory of Harrisonville Telephone Company is located in the southwestern corner of the State. The Company's operating territory is a bedroom community for St. Louis, Missouri. We provide local exchange telephone service to the contiguous exchanges of Columbia, Dupo, Prairie du Rocher, Renault, Red Bud, Valmeyer, and Waterloo. The Company has approximately 19,826 access lines and serves 525 square miles.

- 6. Q. Are you familiar with the Petition filed in this case?
 - A. Yes, I am.
- 7. Q. Please explain the authority sought by Harrisonville Telephone Company in this Petition?
 - A. Harrisonville Telephone Company is seeking authority to change a portion of its Columbia and Waterloo exchange boundaries. The boundary change affects the Waterloo and Columbia exchanges of Harrisonville Telephone Company and the Millstadt Exchange of Verizon North, Inc. The boundary change does not affect the service territory of any other telephone company.

The area to be added to the Columbia Exchange is partially within the Millstadt Exchange of Verizon and partially within the Waterloo Exchange of Harrisonville Telephone Company and is located to the south and east of Columbia's existing exchange boundary. The purpose of the change in boundary is to accommodate the location of a newly developing subdivision in one exchange and to take advantage of the natural boundaries that exist in the area.

- 8. Q. Is Harrisonville Telephone Company seeking new Certificates of Exchange Service Authority under the provisions of the Public Utility Act for its Waterloo and Columbia Exchanges to reflect the changed boundaries?
 - A. Yes.
- 9. Q. Is Harrisonville the principal provider of telephone service in the Waterloo exchange?
 - A. Yes. Harrisonville's most recent certificate for its Waterloo Exchange was issued January 5, 1995 in ICC Docket 94-0192.
- 10. Q. Is Harrisonville Telephone Company the principal provider of local exchange telecommunications service in the Columbia exchange?
 - A. Yes. Harrisonville's most recent certificate of its Columbia Exchange was issued October 27, 1993 in ICC Docket 93-0326.
- 11. Q. Please explain in more detail why the Company is proposing these boundary changes?
 - A. A new subdivision, known as Stonehenge Subdivision is located partially in Harrisonville Telephone Company, Waterloo exchange and partially in Verizon,

Millstadt exchange. We feel the subdivision should be served by one telephone company. We have a 24 fiber cable just 2 ½ miles from the subdivision in our Columbia exchange and can provide ADSL service.

- 12. Q. I show you what has been marked as Exhibit No. 1 and ask if you can identify this Exhibit?
 - A. Exhibit No. 1 is a map showing our Waterloo exchange area boundary and the area proposed to be deleted from the Waterloo exchange. The area proposed to be deleted is shown highlighted in yellow. The portion of the exchange area shown highlighted in yellow is proposed to be added to Harrisonville's Columbia exchange.
- 13. Q. What are the physical dimensions of the area highlighted in yellow on Exhibit No. 1, and do you have a legal description for the area to be removed from the Waterloo exchange?
 - A. Yes, see the description on Exhibit 2. The area consists of approximately 175 acres.
- 14. Q. I show you what has been marked as Exhibit No. 2 and ask if you can identify this Exhibit?
 - A. Exhibit No. 2 is a legal description of the area to be removed from the Harrisonville Waterloo exchange.
- 15. Q. Would you please explain the lettering system on Exhibit No. 1?
 - Yes. The lettering system is to identify points between which other companies' exchanges have common boundaries.
 Point A is the point of beginning

Between Point A and Point B reflects the common boundary of Columbia Exchange Between Point B and Point C is the common boundary with the Millstadt Exchange Between Point C and Point D is the common boundary of the Hecker Exchange Between Point D and Point E is the common boundary between Red Bud Exchange Between Point E and Point F is the common boundary between Renault Exchange Between Point F and Point A is the common boundary between Valmeyer Exchange.

- 16. Q. Are there any customers or locations in the area highlighted in yellow on Exhibit No. 1 that are presently receiving telephone service from the Waterloo exchange?
 - A. Yes. Three subscribers.

- 17. Q. What will be the status of those customer(s) if the boundary change is approved, and what is the Company's plan for notifying the customers of any options they may have or changes which may affect them?
 - A. The customer will become a frozen subscriber in the Waterloo exchange. We plan a personal visit with each subscriber affected by the boundary change.
- 18. Q. Will this boundary change in any way affect service to any existing customers in the Waterloo Exchange?
 - A. No. They have the option of staying in the Waterloo exchange and becoming a frozen subscriber. They also may switch to the Columbia exchange after the new telephone facilities are installed.
- 19. Q. If the boundary line is accepted as proposed, will the telephone number of any existing subscriber in the Waterloo exchange be changed?
 - A. No.
- 20. Q. Will the boundary change, in any way alter or change the price of telecommunications service to any current subscriber in the Waterloo exchange?
 - A. No.
- 21. Q. Will this boundary change in any way affect Extended Area Service to any current customers in the Waterloo exchange?
 - A. No.
- 22. Q. Will this boundary change affect long distance service to any customer in the Waterloo exchange?
 - A. No.
- 23. Q. Is there 9-1-1 service available to the territory which you propose to remove from the Waterloo exchange, and if so, will such service be affected by the boundary change?
 - A. Yes there is 9-1-1 service available to the territory which we proposed to remove from the Waterloo exchange, but it will not be affected by the boundary change.

- 24. Q. Will the area highlighted in yellow on Exhibit No. 1 continue to receive E911 service?
 - A. Yes, from Monroe and St. Clair Counties.
- 25. Q. I show you what has been marked as Exhibit No. 3 and ask if you can identify this Exhibit?
 - A. Exhibit No. 3 is a map showing Verizon's Millstadt exchange area boundary and the area proposed to be deleted from the Millstadt exchange. The area proposed to be deleted is shown highlighted in yellow. The portion of the exchange area shown highlighted in yellow is proposed to be added to Harrisonville's Columbia exchange.
- 26. Q. I show you what has been marked as Exhibit No. 4 and ask if you can identify this Exhibit?
 - A. Exhibit No. 4 is a legal description of the area to be removed from the Verizon Millstadt exchange.
- 27. Q. To your knowledge, are there any customers or locations in the area highlighted in yellow on Exhibit No. 3 that are presently receiving telephone service from the Millstadt exchange?
 - A. I am not aware of any customers in the yellow area on Exhibit No. 3.
- 28. Q. Is there 9-1-1 service available to the territory which you propose to remove from the Millstadt exchange, and if so, will such service be affected by the boundary change?
 - A. Yes, there is 9-1-1 service generally available in the Millstadt exchange, however as I stated earlier I am not aware of any actual customers in the area which we propose to remove from the Millstadt exchange. 9-1-1 service to the area will not be affected by the boundary change.
- 29. Q. I show you what is marked as Exhibit No. 5 and ask if you can identify this exhibit.
 - A. Exhibit No. 5 is a map showing our Columbia exchange area boundary and the area proposed to be added to the Columbia exchange. The area shaded in green is the area that is being added to the Columbia exchange from the Waterloo exchange and the area shaded in red is the area that is being added to the Columbia exchange from the Millstadt exchange of Verizon North, Inc. The "no man's land" is shown on this map.

- 30. Q. Would you please explain the lettering system on Harrisonville Exhibit No. 5?
 - A. Yes. The lettering system is to identify points between which other companies' exchanges have common boundaries.
 Point A is the point of beginning
 Between Point A and Point B reflects the common boundary of Dupo Exchange

Between Point A and Point B reflects the common boundary of Dupo Exchange Between Point B and Point C is the common boundary with the Millstadt Exchange Between Point C and Point D is the common boundary of the Waterloo Exchange Between Point D and Point E is the common boundary between Valmeyer Exchange Between Point E and Point A is the Mississippi River

- 31. Q. What are the physical dimensions of the area highlighted in red and green on Exhibit No. 5, and do you have a legal description for the area to be added to the Columbia exchange?
 - A. The area consists of approximately 344 acres and the legal description is set forth in Exhibit No. 6.
- 32. Q. I show you what has been marked as Exhibit No. 6 and ask if you can identify this Exhibit?
 - A. Exhibit No. 6 is a legal description of the area to be added to the Harrisonville Columbia exchange.
- 33. Q. Please explain why Harrisonville is adding the areas colored in red on Exhibit No. 5 to the Columbia exchange?
 - A. As I said before, we have 24 fiber cable only 2 ½ miles from the Stonehenge Subdivision in our Columbia Exchange.
- 34. Q. Please explain why Harrisonville is adding the areas colored in green on Exhibit No. 5 to the Columbia exchange?
 - A. While placing fiber cable to the Stonehenge Subdivision, we will also place a copper cable along Gilmore Lake Road to serve new homes along this route for the area colored in green.
- 35. Q. Will this boundary change, in any way alter or change the price of telecommunications service to any current subscriber?
 - A. No.

- 36. Q. Will this boundary change in any way affect Extended Area Service to these frozen customers or any other customers in the Columbia and Waterloo exchanges?
 - A. No.
- 37. Q. Will this boundary change affect long distance service of the frozen customers or any other customers in the Waterloo or Columbia exchanges?
 - A. No.
- 38. Q. Can you tell us how many access lines there currently are in the Waterloo exchange?
 - A. Yes. There are approximately 6,359 access lines in the Waterloo exchange.
- 39. Q. Can you tell us how many access lines there currently are in the Columbia exchanges?
 - A. Yes. There are approximately 5,291 access lines in the Columbia exchange.
- 40. Q. Does the Company possess sufficient technical, financial and managerial resources and ability to provide local telephone exchange service in the Waterloo and Columbia exchange?
 - A. Yes.
- 41. Q. Does the public convenience and necessity require the continued construction, operation and maintenance of telephone facilities and the transaction of telecommunications service by Harrisonville Telephone Company in its Waterloo and Columbia exchanges.
 - A. Yes.
- 42. Q. Does the Company intend to file new Exchange Maps with this Commission for its Waterloo and Columbia Exchanges showing its new exchange boundaries if it receives favorable action in connection with this Application?
 - A. Yes. 45 days after the boundary change is approved.

- 43. Q. Does the public convenience and necessity require the continued provision by Verizon North, Inc. of local exchange telecommunications services in its Millstadt Exchange?
 - A. Yes.
- 44. Q. Does this conclude your testimony?
 - A. Yes.

CERTIFICATE OF SERVICE

The undersigned, TROY A. FODOR, hereby certifies that on the _______ day of _______, 2001, he served a copy of the foregoing instrument by personally delivering a copy thereof and/or mailing a copy thereof by United States Mail, postage prepaid, at Springfield, Illinois, to the individuals named below in envelopes plainly addressed to each of them.

John Albers Hearing Examiner Illinois Commerce Commission 527 E. Capitol Springfield, IL 62701

James Hargrave
Asst. Vice President for Pubic Policy
and External Affairs
Verizon North Inc.
1312 E. Empire
Bloomington, IL 61701

TROY A. FODOR

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